

# **EXHIBIT H**

**Declaration of Philip P. Mann**

**Case No. 21-CV-0817-TSZ**

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

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BUNGIE, INC., a Delaware  
corporation,

Plaintiff,

vs.

NO. 2:21-cv-0811 TSZ

AIMJUNKIES.COM, a business of )  
unknown classification; )  
PHOENIX DIGITAL GROUP LLC, an )  
Arizona limited liability )  
company; JEFFREY CONWAY, an )  
individual; DAVID SCHAEFER, an )  
individual; JORDAN GREEN, an )  
individual; and JAMES MAY, an )  
individual, )

Defendants. )

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DEPOSITION UPON ORAL EXAMINATION OF YS (AKA JOHN DOE)

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May 9, 2023

Via Zoom Videoconference

1           can make it bigger, have at it.

2                   MR. RAVA: I don't think I can.

3    A        I don't think I've ever seen -- I don't know what this is.

4    Q        (By Mr. Mann) We're not too sure either.

5                   Let's go to Exhibit 8. This was a document produced to  
6       us by Bungie under Bungie production control number  
7       Bungie\_WDWA\_0000479. Mr. Doe, do you recognize this  
8       document?

9    A        No.

10   Q       Do you recognize -- it says order, "134194515" or  
11       "1.0 Bitcoin"?

12   A        No.

13   Q       Does any of this stuff refresh your recollection?

14   A        No. I have no idea what this is.

15   Q       Do you have any idea how this came into the possession of  
16       Bungie?

17   A        No, I don't think so.

18   Q       So as we sit here today, you can't tell me anything about  
19       what Exhibit 8 is. Is that correct?

20   A        Yeah, I don't know what that is. I mean, it certainly  
21       appears to be a receipt for something. I just don't know  
22       what or for who.

23   Q       Give me a moment, please.

24                   MR. MANN: If we can go a little bit out of order,  
25       if we can pull up Exhibit 16. Again, if we can zoom in on

1           this, that would be nice. A bit more, if we could, please.

2           That should work.

3       Q       (By Mr. Mann) This was a document that was produced to us  
4           under Bungie production control numbers Bungie\_WDWA\_0000606  
5           and 607. Do you recognize what this is?

6       A       Vaguely.

7       Q       I believe you testified earlier that when you made a  
8           purchase at the AimJunkies site, Destiny 2 cheat software,  
9           that you had a page to complete the purchase. Do you recall  
10          that testimony?

11      A       I do.

12      Q       Is this what you saw when you had to complete the purchase?

13      A       Don't remember exactly.

14      Q       Is it possible you saw this?

15      A       Yep.

16      Q       And in order to complete the purchase, you would have had to  
17          fill out this form and submit it. Correct?

18      A       It appears that way, but, again, I don't remember exactly.

19      Q       You don't deny seeing this form, do you?

20      A       I don't remember.

21      Q       So it's possible you saw it?

22      A       Don't remember.

23      Q       Again, is it possible you saw it?

24      A       Yeah, sure.

25                   MR. RAVA: Is it possible to scroll down to the